

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Crystal Nix-Hines (Bar No. 326971)
(crystalnixhines@quinnemanuel.com)

3 Shon Morgan (Bar No. 187736)
(shonmorgan@quinnemanuel.com)

4 Marina Lev (Bar No. 321647)
(marinalev@quinnemanuel.com)

5 865 South Figueroa Street, 10th Floor

6 Los Angeles, California 90017

7 Telephone: (213) 443-3000

Facsimile: (213) 443-3100

8 Cristina Henriquez (Bar No. 317445)
(cristinahenriquez@quinnemanuel.com)

9 555 Twin Dolphin Drive, 5th Floor

10 Redwood Shores, California 94065

Telephone: (650) 801-5000

Facsimile: (650) 801-5000

11 Attorneys for Defendants

12 VERIZON WIRELESS and VERIZON
13 COMMUNICATIONS, INC.

14 UNITED STATES DISTRICT COURT

15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 TERESA MACCLELLAND; KAREN
17 UMBERGER; SCOTT WILLITS; MICHAEL
18 BRANOM; MOLLY BROWN; MICHAEL
19 CARNEY; TIM FRASCH; PATRICIA GAGAN;
20 ANNA GUTIERREZ; LINDA JENKINS;
21 AUGUSTUS JOHNSON; WILLIAM KAUPELIS;
22 MARILYN KAYE; JANETTE LISNER;
23 WILLIAM ERIC LOUGH; DAVID MASSARO;
24 LOUISE MONSOUR; DARLEEN PEREZ;
25 GABRIELLE POZZUOLI; VALERIE REED;
26 BRUCE SCHRAMM; KERRY SHOWALTER;
27 JOHN ST. JARRE; GLORIA STERN; EDNA
28 TOY; TERESA TOY; and VANESSA WEST; For
Themselves, As Private Attorneys General, and On
Behalf Of All Others Similarly Situated,
Plaintiffs,

vs.

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS; and VERIZON
COMMUNICATIONS INC.,

Defendants.

CASE No. 3:21-cv-08592-EMC

**VERIZON'S REQUEST FOR LEAVE
TO FILE NOTIFICATION OF
CHANGE TO CUSTOMER
AGREEMENT**

Judge: Hon. Edward M. Chen

1 Defendants Verizon Wireless and Verizon Communications, Inc. (collectively, "Verizon")
2 respectfully request leave to file the Notice submitted concurrently herewith and supporting
3 evidence (Declaration of Lacy Kennedy, IV). These materials address new factual developments
4 that address issues raised by Verizon's pending motion to compel.

5
6
7 DATED: June 8, 2022

QUINN EMANUEL URQUHART &
8 SULLIVAN, LLP

9
10 By /s/ *Crystal Nix-Hines*

11 Crystal Nix-Hines
12 Attorneys for Defendants
13 VERIZON WIRELESS and VERIZON
14 COMMUNICATIONS, INC.